



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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SAN DIEGO, CA 92108-4310

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Ser BPMOW.cpa/0372
20 Apr 2006

Mr. Richard Muza
Remedial Project Manager
U.S. Environmental Protection Agency
Mail Code SFD-H8, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. John Broderick
Remedial Project Manager
California Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Ms. Sue Hakim
Remedial Project Manager
California Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630-4700

SUBJECT: FINAL EXPLANATION OF SIGNIFICANT DIFFERENCES SITE 18 – REGIONAL
VOLATILE ORGANIC COMPOUND (VOC) GROUNDWATER PLUME (OPERABLE
UNIT 1), SITE 24 – VOC SOURCE AREA (OPERABLE UNIT 2A), FORMER
MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA

Fellow Federal Facility Agreement (FFA) Representatives:

It is our pleasure to submit the enclosed executed signature sheet for inclusion in the previously transmitted Final Explanation Of Significant Differences (ESD) Site 18 – Regional Volatile Organic Compound (VOC) Groundwater Plume (Operable Unit 1), Site 24 – VOC Source Area (Operable Unit 2A), Former Marine Corps Air Station (MCAS) El Toro, California dated February 2006.

Thank you for your continued support in advancing the installation restoration program forward. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Remedial Project Manager, at (619) 532-0790 or me at (619) 532-0963.

Sincerely,

DARREN NEWTON
BRAC Environmental Coordinator
By direction of the Director

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20 Apr 2006

Enclosure: 1. Final Explanation Of Significant Differences Site 18 – Regional Volatile Organic Compound (VOC) Groundwater Plume (Operable Unit 1), Site 24 – VOC Source Area (Operable Unit 2A), Former Marine Corps Air Station (MCAS) El Toro, California. Page 5 and 6 – February 2006

Copy to:
Ms. Marcia Rudolph
Subcommittee Chair
El Toro Restoration Advisory Board
24922 Muirlands #139
Lake Forest, CA 92630

Commandant of the Marine Corps
Attn: LCDR Tricia Samora, USN
2 Navy Annex, Room 3109 (LFL)
Washington, D.C. 20380-1775

Commander
Attn: AC/S Environ Mgt
Marine Corps Air Bases Miramar
P.O. Box 452001
San Diego, CA 92145-2001

Mr. Robert L. Woodings
Director, Public Works
City of Lake Forest
25550 Commercentre Dr., Ste. 100
Lake Forest, CA 92630

Mr. Steve Malloy
Irvine Ranch Water District
15600 Sand Canyon Avenue
Irvine, CA 92618

Mr. Roy Herndon
Orange County Water District
10500 Ellis Avenue, P.O. Box 8300
Fountain Valley, CA 92708-8300

Mr. James Werkmeister
Manager, Environmental Affairs
Lennar, Heritage Fields
7130 Trabuco Road
Irvine, CA 92618

The revised location for the SGU VOC Treatment Plant and alternative SGU disposal to the non-CERCLA brine line will require modifications to pumping and pipeline conveyance systems from the SGU VOC Treatment Plant to Injection Well IDP-1, and to the back-up connection to the SOCWA ocean outfall. Treated SGU water will not be connected to IRWD's non-potable system.

The SFA, OCWD, and IRWD have agreed to changes to the Settlement Agreement to reflect the design revisions described in this ESD. The amended Settlement Agreement provisions (with revised Appendices 4 and 5) are included in this ESD as Attachment B.

The revised system is shown in Figures 4-1 and 4-2 which hereby replaces the system as described in Sections 10.2 (CERCLA component) and 10.3 (non-CERCLA component), and shown on Figures 10-1 (PA well configuration), 10-2 (SGU well configuration), and 10-3 (conceptual treatment) of the Final ROD (DON 2002). Updated descriptions of the primary components of the Modified IPD are presented in Attachment C.

5.0 Support Agency Comments

Documentation of regulatory comment on the Draft ESD is provided in Attachment A. In summary, the U.S. EPA requested a change to the delegated signatory, and DTSC and RWQCB had no comments. The U.S. EPA signatory has been revised in accordance with their request. Correspondence from U.S. EPA (September 26, 2005), DTSC (September 19, 2005), and RWQCB (October 5, 2005) is presented in Attachment A.

6.0 Statutory Determinations

The remedy as changed pursuant to this ESD complies with CERCLA and the NCP, remains protective of human health and the environment, and complies with ARARs identified in the ROD.

7.0 Public Participation

This ESD will become part of the administrative record for the site (NCP, 40 CFR Section 300.825 (a)(2)). A notice of public availability and a brief description of the ESD will be published in a major local newspaper. The ESD is available for public review at the following locations:

- Heritage Park Regional Library
MCAS El Toro Information Repository
14361 Yale Avenue
Irvine, CA 92604
(949) 551-7151
Hours: Monday – Thursday: 10:00 A.M. to 9:00 P.M.
Friday and Saturday: 10:00 A.M. to 5:00 P.M.
Sunday: Noon to 5:00 P.M.
- MCAS El Toro Administrative Record File
BRAC Office, Building 307
Former MCAS El Toro
Contact Ms. Marge Flesch
(949) 726-5398

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

March 15, 2006

Mr. Darren Newton
BRAC Environmental Coordinator
Base Realignment and Closure
7040 Trabuco Road
Irvine, California 92618

Subject: Final Explanation of Significant Differences, Site 18 – Regional Volatile Organic Compound Groundwater Plume (Operable Unit 1) and Site 24 – Volatile Organic Compounds Source Area (Operable Unit 2A)
Former Marine Corps Air Station (MCAS) El Toro, California

Mr. Newton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Explanation of Significant Differences (ESD) from the Record of Decision for Sites 18 and 24 -- Regional VOC Plume -- at the Former MCAS El Toro and has determined that our comments have been adequately addressed. EPA concurs with the ESD and transmits herewith the signature page for approval of the ESD.

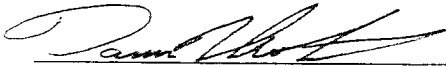
If you have any questions regarding EPA's concurrence, please direct them to Rich Muza at 415-972-3349. Thank you.

Sincerely,



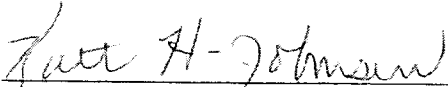
Kathleen H. Johnson, Chief
Federal Facility and Site Cleanup Branch

cc. Frank Cheng, DTSC
John Broderick, RWQCB



Mr. Darren Newton
Base Realignment and Closure Environmental Coordinator
Former Marine Corps Air Station El Toro

Date: FEB-6-06



Kathleen Johnson, Chief
Federal Facility and Site Cleanup Branch
United States Environmental Protection Agency, Region 9

Date: 3/14/06

Mr. John E. Scandura, Chief
Southern California Operations
Office of Military Facilities
Department of Toxic Substances Control

Date: _____

Mr. Gerard Thibeault
Executive Officer
Regional Water Quality Control Board Santa Ana Region

Date: _____